



State of Idaho
DEPARTMENT OF HEALTH AND WELFARE
Division of Medicaid

PHILIP E. BATT
GOVERNOR
LINDA L. CABALLERO
DIRECTOR

BUREAU OF FACILITY STANDARDS

Towers Building – 3rd Floor
P.O. Box 83720
Boise, ID 83720-0036
(208) 334-6626
Fax (208) 332-7204

INFORMATIONAL LETTER #96-10

DATE: August 22, 1996

TO: All Skilled Nursing Facilities Certified for Medicare/Medicaid

FROM: John W. Hathaway, Chief
Bureau of Facility Standards

SUBJECT: CHANGES IN FIRE/LIFE SAFETY SURVEY REPORTING

On July 1, 1995, the Bureau of Facility Standards implemented the enforcement regulations for the health portion of all long term care facility surveys as directed by HCFA. HCFA now has directed us to incorporate the enforcement regulations and procedures into the fire/life safety portion of the survey. Starting September 1, 1996, the following changes will be implemented:

1. The fire/life safety survey deficiency report HCFA-2567, will be computer generated using the same ASPEN program currently used by the health surveyors.
2. A scope and severity designation will be assigned to each citation. Currently the fire/life safety portion of the ASPEN program cannot assign letter designations (A, B, C, etc.) for scope and severity. Instead severity and scope will be designated by number with severity listed first. For example, a citation with a severity of no actual harm, with potential for minimal harm (1) and scope of widespread (3), will have the designation "1/3" at the end of the citation on the HCFA-2567. As soon as HCFA makes the needed changes in the ASPEN software, the scope and severity designations will conform to the A, B, C system currently utilized in the health portion of the survey.
3. Deficiencies with a scope and severity of 1/1, or A, do not require a plan of correction and should print on a separate form called the "A" form. However at this time the Fire/Life Safety portion of the ASPEN program is not able to print an "A" form, and these citations print on the usual HCFA-2567. These citations still do not require a Plan of Correction. This also will be corrected as soon as HCFA corrects the ASPEN program.

4. The fire/life safety survey report now will come to the facility with a cover letter that incorporates all the enforcement regulation requirements. This is the same cover letter that is currently received with the health survey HCFA-2567.
5. Some buildings contain more than one licensed facility, for example, a hospital and a nursing facility. Currently these buildings receive one combined fire/life safety survey report for all facilities within that one building. Starting September 1, these facilities will receive separate survey findings even though they may have been surveyed at the same time. In some cases, the survey reports for the hospital and the survey reports for the nursing facility may be identical except for any findings under state licensure that may be different under each program. The separation is necessary to incorporate the enforcement requirements for the long term care facility.

The fire/life safety requirements have not changed, nor have any interpretations changed. If you have any questions concerning the new format for these surveys, please do not hesitate to contact Loretta Todd or Roger Gehrke at (208) 334-6626.

JOHN W. HATHAWAY, Chief
Bureau of Facility Standards

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cc: Idaho Heath Care Association

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